

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:

Broadcast Localism

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MB Docket No. 04-233

Comments of the Nebraska Farm Bureau Federation

Pursuant to 47 C.F.R. §§ 1.415 and 1.419, the Nebraska Farm Bureau Federation (NFBF) submits these comments in response to the FCC's Notice of Inquiry released July 1, 2004 concerning Broadcast Localism, specifically paragraphs 13 through 15. We strongly support this proceeding to initiate a dialogue with the public on how the Commission can best ensure that broadcasters fulfill their obligations to serve their communities of license. Our comments concern a communications issue that is vitally important to Nebraska's farmers and ranchers: the dramatic decline in agricultural news programming on radio.

We are fortunate to have the nation's only farmer- and rancher-owned radio network in our state; its stations are located in the far western, south central and northeast parts of our state and they provide farm programming throughout the broadcast day. However, these stations do not reach all of the Nebraska farmers and ranchers who need timely ag news, weather and market information.

We have seen a significant decline in the number of Nebraska radio stations that employ professional farm broadcasters and provide local farm news. Several regional networks deliver syndicated ag news to a number of Nebraska radio stations and while this is helpful, it does not meet farmers' and ranchers' need for farm news from their local area.

It has been suggested the gap in radio farm news can be filled by such other services as Internet websites and subscription-based market advisory services. Unfortunately these services lack the ability to be with the farmer throughout the work day. A farmer might consult his computer once early in the morning and again late at night, but during the business day when he needs to make marketing decisions, he will likely be on the tractor or combine, driving a farm truck or attending a meeting.

Only radio has the ability to move with the farmer as he moves through his day. If the news reports that prices for soybeans have risen a few cents, for example, the farmer can take immediate action to sell some of his crop and realize a greater return on his investment. Because farmers do not set the prices for their commodities, they need to be constantly informed of market price movement in order to take advantage of selling opportunities when they occur.

As with the rest of the nation, Nebraska has been affected by the trend since the late 1990s of large ownership groups buying local stations. To a greater degree than before the changes in ownership rules, programming on local stations is being driven by a corporate headquarters that is much more concerned about the bottom line than serving the needs of the local community. In Nebraska, agriculture is the backbone of the economy of both our large cities and our hundreds of rural communities. Farm news is vital to our economies because impacts on agriculture cascade across our communities.

Station owners and managers have noted the dramatic 45-percent drop in national farm advertising during the past five years. There are several causes – a weaker farm economy, companies offering and advertising fewer new products, and the most significant: as chemical companies and seed companies and other ag suppliers have merged and lessened competition in the marketplace, the new companies have advertised less.

As a result of these ownership and advertising changes, many radio station owners and managers of stations serving rural areas believe they need to offer programming that appeals to a wider audience and they have changed their formats to reduce time devoted to agriculture news or to eliminate it entirely. But it is important to note that it is more than the farm audience that benefits from farm broadcasting. When the one BSE-infected cow was found in Washington state in December 2003, it was professional farm broadcasters and farm radio stations that took the lead in explaining the issue and placing the single case in context. Where a professional farm broadcaster was on the radio explaining the situation, people did not panic.

Farm broadcasters and the stations that continue to offer farm news have recognized the need to appeal to a broader audience, by placing agricultural news in a context that includes what it means for the nonfarming public. Biotechnology and trade are examples of ag issues with consequences for the public in general.

We recognize that market forces affect the broadcast industry, just as they do our industry and many others. But this does not detract from the fact that many stations have a rural audience that is no longer being adequately served. As you seek to encourage more community-responsive programming, we strongly urge that you include farm programming in that effort.

Respectfully submitted,

A handwritten signature in black ink that reads "Keith R. Olsen". The signature is written in a cursive, flowing style.

Keith R. Olsen, President
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Aug. 31, 2004